

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CHANMONY HUOT, VLADIMIR
SALDAÑA, CHAMPA PANG; LIANNA
KUSHI, THOEUN KONG, DENISSE
COLLAZO, SUE J. KIM, SOADY OUCH,
TOOCH VAN, CARMEN BERMUDEZ,
KEI KAWASHIMA-GINSBERG,
DANIEL K. UK, and FAHMINA ZAMAN,

Plaintiffs,

v.

CITY OF LOWELL, MASSACHUSETTS;
KEVIN J. MURPHY, in his official
capacity as Lowell City Manager; LOWELL
CITY COUNCIL; RITA M. MERCIER,
RODNEY M. ELLIOTT, EDWARD J.
KENNEDY, JR., JOHN J. LEAHY,
WILLIAM SAMARAS, JAMES L.
MILINAZZO, DANIEL P. ROURKE,
COREY A. BELANGER, JAMES D.
LEARY, in their official capacities as
members of the Lowell City Council;
LOWELL SCHOOL COMMITTEE;
STEPHEN J. GENDRON, JACQUELINE
DOHERTY, CONNIE A. MARTIN,
ROBERT J. HOEY, JR., ROBERT JAMES
GIGNAC, ANDRE DESCOTEAUX, in
their official capacities as members of the
Lowell School Committee; LOWELL
ELECTION AND CENSUS
COMMISSION; and BEVERLY ANTHES,
JOSEPH MULLEN, THEL SAR,
THOMAS FR. O'BRIEN, in their official
capacities as members of the Lowell
Election and Census Commission,

Defendants.

Case No. 1:17-cv-10895-DLC

JURY TRIAL DEMANDED

JOINT MOTION TO AMEND CASE SCHEDULE

Plaintiffs and Defendants jointly request that the Court amend the case schedule while the parties continue to pursue mediation. Good cause exists for the parties' motion. The parties have engaged in five productive mediation sessions since December 18, 2019, with an additional mediation session scheduled for February 21, 2019. The proposed extension to the case schedule will allow the parties to continue to focus their efforts on timely and amicable resolution of the lawsuit. The parties request an extension of eight (8) weeks to all case deadlines to reflect the progress that has been made in the last several weeks, and the parties' mutual belief that such progress is likely to continue.

The parties expect that the current proposed extension will allow sufficient time for the parties to attempt to reach a final settlement that resolves the lawsuit, without prejudice to either party's ability to pursue its claims and defenses at trial, should mediation ultimately prove unsuccessful. Accordingly, the parties request that the Court enter the following amended case schedule:

Event	Current Deadline	Amended Deadline
Deadline to substantially complete document production Counsel will make good faith efforts to produce all required documents as soon as they are available and avoid significant document production at or near the substantial completion deadline	January 18, 2019	March 15, 2019
Completion of fact discovery/depositions other than expert depositions	March 15, 2019	May 10, 2019
Service of Plaintiffs' expert report(s)	March 19, 2019	May 14, 2019
Service of Defendants' expert report(s)	April 9, 2019	June 4, 2019
Any rebuttal reports by	May 7, 2019	July 2, 2019
Completion of expert discovery	June 7, 2019	August 2, 2019

Filing of dispositive motions	June 28, 2019	August 23, 2019
Filing of oppositions and replies to dispositive motions	Twenty-one (21) days for an opposition; seven (7) days for a Reply of up to twelve pages; no sur-reply without leave of Court. There is a presumption that these deadlines will not be extended.	Twenty-one (21) days for an opposition; seven (7) days for a Reply of up to twelve pages; no sur-reply without leave of Court. There is a presumption that these deadlines will not be extended.

The parties may request additional extensions of the discovery schedule should such extensions be necessary to continue the mediation process, or with other showing of good cause.

A Proposed Order Amending Case Schedule is attached as Exhibit 1 for the Court's consideration.

Dated: February 8, 2019

Respectfully submitted,

/s/ Scott Taylor

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/s/ Rachel Brown

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*MULLEN, THEL SAR, THOMAS FR. O'BRIEN, in
their official capacities as members of the Lowell
Election and Census Commission.*

CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2019, I filed a copy of this document through the Electronic Case Filing System for filing and electronic service to the registered participants as identified on the Notice of Electronic Filing.

/s/ Scott Taylor

Scott Taylor